IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	**CR. NO. ____________**
PLAINTIFF,	)	
	)	**21 U.S.C. § 846**
vs.	)	**21 U.S.C. § 843(b)**
	)	**18 U.S.C. § 2**
TIAR SHABBAZ,	)	
A/K/A "CHICAGO,"	)	
ANDRE BOWEN,	)	
TAMARA JOHNSON,	)	
DENNIS GUNN, and	)	
LAKISHA SHARP,	)	
	)	
DEFENDANTS.	)	

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

From at least in or about February, 2008, and continuing to in or about July, 2008, in the Western District of Tennessee and elsewhere, the defendants,

------------------------------**TIAR SHABBAZ**------------------------------

------------------------------**A/K/A "CHICAGO"**------------------------------

------------------------------**ANDRE BOWEN**------------------------------

------------------------------**TAMARA JOHNSON**------------------------------

------------------------------**DENNIS GUNN**------------------------------

AND

------------------------------**LAKISHA SHARP**------------------------------

did unlawfully, knowingly and intentionally conspire, combine, confederate and agree with others, known and unknown to the Grand Jury, to possess with the intent to distribute and to distribute controlled substances, to wit, less than fifty (50) kilograms of marijuana, a controlled substance as classified by Title 21, United States Code, Section 812 and Title 21, Code of Federal Regulations, Section 1308.11 as a Schedule I controlled substance, and Xanax (alprazolam tablets), a controlled substance as classified by Title 21, United States Code, Section 812 and Title 21, Code of Federal Regulations, Section 1308.14 as a Schedule IV controlled substance, in violation of Title 21, United States Code, Section 846.

COUNT 2

On or about February 4, 2008, in the Western District of Tennessee, the defendants,

---------------------------------ANDRE BOWEN---------------------------------

-------------------------------TAMARA JOHNSON-------------------------------

and

-----------------------------------DENNIS GUNN---------------------------------

being aided and abetted, each by the other, did knowingly and intentionally use a communications facility, to wit, a telephone, in causing or facilitating the commission of an act constituting a felony under the Controlled Substances Act, 21 United States Code Section(s) 801, et seq., to wit, conspiracy to possess with intent to distribute and distribute controlled substances, in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 3

On or about February 6, 2008, in the Western District of Tennessee, the defendants,

------------------------------ANDRE BOWEN------------------------------

and

------------------------------DENNIS GUNN------------------------------

being aided and abetted, each by the other, did knowingly and intentionally use a communications facility, to wit, a telephone, in causing or facilitating the commission of an act constituting a felony under the Controlled Substances Act, 21 United States Code Section(s) 801, et seq., to wit, conspiracy to possess with intent to distribute and distribute controlled substances, in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 4

On or about February 14, 2008, in the Western District of Tennessee, the defendants,

----------------------------------ANDRE BOWEN----------------------------------

and

-----------------------------------DENNIS GUNN-----------------------------------

being aided and abetted, each by the other, did knowingly and intentionally use a communications facility, to wit, a telephone, in causing or facilitating the commission of an act constituting a felony under the Controlled Substances Act, 21 United States Code Section(s) 801, et seq., to wit, conspiracy to possess with intent to distribute and distribute controlled substances, in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 5

On or about February 23, 2008, in the Western District of Tennessee, the defendants,

-----------------------------------ANDRE BOWEN-----------------------------------

and

-----------------------------------TAMARA JOHNSON-----------------------------------

being aided and abetted, each by the other, did knowingly and intentionally use a communications facility, to wit, a telephone, in causing or facilitating the commission of an act constituting a felony under the Controlled Substances Act, 21 United States Code Section(s) 801, et seq., to wit, conspiracy to possess with intent to distribute and distribute controlled substances, in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 6

On or about March 5, 2008, at approximately 18:35 hours, in the Western District of Tennessee, the defendants,

-----------------------------------ANDRE BOWEN-----------------------------------

--------------------------------TAMARA JOHNSON--------------------------------

and

-----------------------------------DENNIS GUNN-----------------------------------

being aided and abetted, each by the other, did knowingly and intentionally use a communications facility, to wit, a telephone, in causing or facilitating the commission of an act constituting a felony under the Controlled Substances Act, 21 United States Code Section(s) 801, et seq., to wit, conspiracy to possess with intent to distribute and distribute controlled substances, in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 7

On or about March 5, 2008, at approximately 20:14 hours, in the Western District of Tennessee, the defendants,

------------------------------------ANDRE BOWEN------------------------------------

and

------------------------------------DENNIS GUNN------------------------------------

being aided and abetted, each by the other, did knowingly and intentionally use a communications facility, to wit, a telephone, in causing or facilitating the commission of an act constituting a felony under the Controlled Substances Act, 21 United States Code Section(s) 801, et seq., to wit, conspiracy to possess with intent to distribute and distribute controlled substances, in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 8

On or about April 18, 2008, in the Western District of Tennessee, the defendants,

------------------------------ANDRE BOWEN------------------------------

and

------------------------------DENNIS GUNN------------------------------

being aided and abetted, each by the other, did knowingly and intentionally use a communications facility, to wit, a telephone, in causing or facilitating the commission of an act constituting a felony under the Controlled Substances Act, 21 United States Code Section(s) 801, et seq., to wit, conspiracy to possess with intent to distribute and distribute controlled substances, in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 9

On or about June 24, 2008, at approximately 11:14 hours, in the Western District of Tennessee, the defendants,

---TIAR SHABBAZ---
---A/K/A "CHICAGO"---
AND
---LAKISHA SHARP---

being aided and abetted, each by the other, did knowingly and intentionally use a communications facility, to wit, a telephone, in causing or facilitating the commission of an act constituting a felony under the Controlled Substances Act, 21 United States Code Section(s) 801, et seq., to wit, conspiracy to possess with intent to distribute and distribute controlled substances, in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 10

On or about June 24, 2008, at approximately 19:23 hours, in the Western District of Tennessee, the defendants,

---TIAR SHABBAZ---

---A/K/A "CHICAGO"---

AND

---TAMARA JOHNSON---

being aided and abetted, each by the other, did knowingly and intentionally use a communications facility, to wit, a telephone, in causing or facilitating the commission of an act constituting a felony under the Controlled Substances Act, 21 United States Code Section(s) 801, et seq., to wit, conspiracy to possess with intent to distribute and distribute controlled substances, in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 11

On or about June 25, 2008, in the Western District of Tennessee, the defendants,

----------TIAR SHABBAZ----------

----------A/K/A "CHICAGO"----------

AND

----------TAMARA JOHNSON----------

being aided and abetted, each by the other, did knowingly and intentionally use a communications facility, to wit, a telephone, in causing or facilitating the commission of an act constituting a felony under the Controlled Substances Act, 21 United States Code Section(s) 801, et seq., to wit, conspiracy to possess with intent to distribute and distribute controlled substances, in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 12

On or about July 13, 2008, in the Western District of Tennessee, the defendants,

TIAR SHABBAZ

A/K/A "CHICAGO"

AND

TAMARA JOHNSON

being aided and abetted, each by the other, did knowingly and intentionally use a communications facility, to wit, a telephone, in causing or facilitating the commission of an act constituting a felony under the Controlled Substances Act, 21 United States Code Section(s) 801, et seq., to wit, conspiracy to possess with intent to distribute and distribute controlled substances, in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

A TRUE BILL:

s/Grand Jury Foreperson

Grand Jury Foreperson

DATED: August 20, 2008

Lawrence J. Laurenzi

LAWRENCE J. LAURENZI
Acting United States Attorney
Western District of Tennessee